

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

NELSON CASTILLO, MARTA)	
VALLADARES, ARACELY VALLADARES)	
CARLOS REYES, YOSELY ESPINAL)	Civil Action No. 17-cv-2972 (AKT)
HENRIQUEZ, VILMA DIAZ and JESSICA)	
CHICAS individually and on behalf of all others)	NOTICE DECLARATION OF
similarly situated,)	AISHA LANGE
)	
Plaintiffs,)	
-against-)	
)	
PERFUME WORLDWIDE INC., PERFUME)	
CENTER OF AMERICA, INC., SHRI)	
PARSHWA PADMAVATI & CO., LLC, 3OVO)	
LOGISTICS INC., TEXVEL, INC., JOHN DOE)	
CORPORATIONS NOS. 1-5, KANAK GOLIA,)	
PIYUSH GOLIA, PRABHA GOLIA and)	
ROMA GOLIA,)	
)	
Defendants.)	

I, AISHA LANGE, declare as follows:

1. I am Assistant Director of Operations at Settlement Services, Inc. ("SSI"). The following statements are based on my personal knowledge and information provided by other SSI employees working under my supervision, and, if called on to do so, I could and would testify competently thereto.

2. SSI is serving in this matter as the Administrator in the Action for the purposes of administering the Class & Collective Action Settlement Agreement preliminarily approved in the Court's Order dated March 22, 2022. I submit this Declaration in order to provide the Court and the Parties to this Action with information regarding the dissemination of the Notice of Class Action Settlement ("Notice"), processed in accordance with the Court's Order.

3. **Class Data.** On April 7, 2022 Defense Counsel provided SSI with one (1) spreadsheet the (The "Class List") which included the name, Hire Date, Termination Date, Rehire Date, Termination Date, Address, Regular Pay Rate, and SSN for one thousand six hundred thirteen (1,613) Class Members. On April 13, 2022, Class counsel provided SSI with a second spreadsheet

the (“Updated Contact Information”) of which included name, and address for one hundred ninety-one (191) Class Members. SSI reviewed both spreadsheets and identified eighty-four (84) potential duplicate records, one hundred twenty-four (124) records with no termination date, and seventeen (17) records with a rehire date, but no second termination date. Defense Counsel advised SSI that of the one hundred twenty-four (124) records with no termination date, fifteen of those records are terminated and the rest are active employees and, of the (17) seventeen records with a rehire date, seven (7) of them are terminated.

4. **NCOA**. In order to obtain the most current mailing address for Class Members, SSI processed the Class Lists addresses through the National Change of Address (“NCOA”) database maintained by the United States Postal Service (“USPS”). This process updates addresses for individuals who have moved within the last four years and who filed a change of address card with the USPS.

5. **Notice**. On April 26, 2022 (the “Notice Date”), SSI mailed the Notices by first-class mail, postage prepaid, from Tallahassee, Florida, to one thousand five hundred fifty-five (1,555) Class Members.

6. **Undeliverable Mail**. As of this date, a total of one hundred ninety-five (195) original Notices have been returned to SSI by the USPS as undeliverable without forwarding address information. SSI conducted a locator trace for the individuals with a returned Notice prior to the postmark deadline, and possible new addresses were obtained for eighty (80) of them. SSI re-mailed a Notice to these possible new addresses.

7. **Remail by Request**. There were one hundred seventeen (117) Notices re-mailed at the request of either Class Counsel or the Class Member.

8. **Remail to PO Forward**. There were three (3) Notices re-mailed to PO forward addresses provided by the US Postal Service.

9. **Requests for Exclusion**. The deadline for Class Members to exclude themselves from the Class is a postmark deadline of May 26, 2022. As of the date of this declaration, SSI has received no (0) timely requests for exclusion.

10. **Objections.** The deadline for Class Members to object to the Settlement was a postmark deadline of May 26, 2022. As of the date of this declaration, SSI has received no (0) objections, timely or otherwise.

11. **QSF Disbursements.** The Settlement Agreement contemplates that SSI will pay from the two million two hundred fifty thousand (\$2,250,000.00) deposited by Defendants in the QSF the following amounts: seven hundred fifty thousand (\$750,000.00) in attorney's fees and costs; seventy thousand dollars (\$70,000.00) in service award payments to Nelson Castillo, Marta Valladares, Carlos Reyes, Yosely Espinal Henriquez, Vilma Diaz and Jessica Chicas, and a capped fee of thirty seven thousand five hundred dollars (\$37,500.00) to SSI for costs of administration. Based on those numbers, the net funds available to the Class Members would be one million three hundred ninety-two thousand five hundred dollars (\$1,392,500.00).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of June 2022, in Tallahassee, Florida.



AISHA LANGE